

REMARKS**I. Overview**

Claims 1-39 are pending. Applicant has amended claims 1-2, 5, 9-12, 14, 20-21, and 23-39.

II. Rejections under 35 U.S.C. § 112

Claims 1-39 are rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Applicant has amended these claims to address the Examiner's concern, and respectfully requests that this rejection be withdrawn.

III. Prior Art Rejections

The Examiner rejected the claims in accordance with the following table. Applicant respectfully traverses these rejections below.

Section	Claims	Reference(s)
35 U.S.C. § 102(e)	1, 3-8, 12-13, 19, 21, 23-26, and 28-38	Ryan (6,412,014)
35 U.S.C. § 103(a)	2, 11, 20, 22, 27, and 39	Ryan + Moncreiff (5,828,839)
35 U.S.C. § 103(a)	14-18	Ryan + Voit (6,104,711)
35 U.S.C. § 103(a)	9-10	Ryan + Official Notice

Ryan describes a supplemental directory service that supplements the existing domain name service (DNS) used on the Internet to allow multiple parties that are interested in a domain name to be associated with that domain name. For example, for a domain name "www.submarine.com," one party might want to register a web site that describes underwater ships, while another party might want to register a web site that sells submarine sandwiches. Using DNS, only one of these web sites can be associated with the domain name. However, Ryan describes a system in which a user can find out about other parties that want to associate themselves with a particular domain name. Ryan suggests a couple of methods for doing this including by appending "/dir" to the domain

name to retrieve a directory of related services (e.g. "www.submarine.com/dir") and by creating a web page that lists all of the parties associated with a web site and returning the address to that web page in response to DNS requests rather than the address of any one of the individual sites. However, in each of these cases, Ryan is directly mapping a domain name to an IP address. Ryan does not describe mapping a domain name to an intermediate identifier or mapping an intermediate identifier to an IP address.

Moncreiff describes an instant messaging service delivered over a television channel. Moncreiff does not contain any teaching related to DNS or resolving domain names to Internet addresses.

Voit describes mapping telephone numbers to IP addresses and mapping domain names to telephone numbers. Voit, however, does not describe that these mappings use any "intermediate identifiers." Rather, Voit either directly maps a telephone number to an IP address or directly maps a domain name to a telephone number without any further mapping.

In contrast, Applicant's technology associates domain names with an intermediate identifier that is provided to a DNS server. Upon receiving a request to translate a domain name into a network address, the DNS server first translates the domain name to the intermediate identifier, and then sends a request to an external dynamic address system to translate the intermediate identifier to a network address. The DNS server receives a response from the dynamic address system and then responds to the original request with the network address. The dynamic address system is typically a system that a user already interacts with and to which the user already has provided a current network address. For example, users of an instant messaging system typically sign-on to the system and provide a current network address so that other users can send instant messages to the user's network address. By utilizing a server that is already aware of the user's current network address, Applicant's technology can provide a regularly updated

address for directing communications to the user without requiring the user to perform additional steps to update the DNS server every time their address changes.

Claims 1-39 recite mapping that includes an "intermediate identifier" such as a "dynamic address name." Claims 1-11 recite mapping a "domain name" to a "user identifier" (i.e., a type of intermediate identifier) and then to a "network address." Claims 12-22 recite mapping a "domain name" to an "intermediate identifier" and then to a "network address." Claims 23-31 recite mapping a "device identifier" to "dynamic address name" and then to a "network address." Claims 32-39 recite mapping a "parameter of a uniform resource identifier" to a "dynamic address name" and then to a "network address." None of the references cited by the Examiner describe a mapping that includes an intermediate identifier. Therefore, Applicant's claims are patentable over these references. Accordingly, Applicant respectfully requests that these rejections be withdrawn.

In addition, in rejecting claims 9-10 the Examiner states that sending an indication not to cache a received address or to cache the received address for a limited period is well known in the art. However, Applicant respectfully submits that in a dynamic address system such as Applicant's, whether or not a client system caches a network address could have a significant impact on the experience of the system's users. For example, if a user's network address is changing every hour (such as when the user moves from their desktop computer in their office, to a laptop computer in a meeting room), then a client system that caches addresses for a day will not provide the most current address for the user after the first hour of the day. Therefore, providing the client system with an indication that the address is dynamic provides a significant benefit to users beyond anything previously known in the art. Accordingly, if the Examiner wishes to maintain this rejection, Applicant respectfully requests that the Examiner provide a reference in support of this teaching.

IV. Conclusion

Based upon these remarks and amendments, Applicant respectfully requests reconsideration of this application and its early allowance. If the Examiner has any questions or believes a telephone conference would expedite prosecution of this application, the Examiner is encouraged to call the undersigned at (206) 359-3265.

Applicant believes all required fees are being paid in connection with this response. However, if an additional fee is due, please charge our Deposit Account No. 50-0665, under Order No. 323328003US from which the undersigned is authorized to draw.

Dated: December 26, 2006

Respectfully submitted,

By 

J. Mason Boswell

Registration No.: 58,388

PERKINS COIE LLP

P.O. Box 1247

Seattle, Washington 98111-1247

(206) 359-8000

(206) 359-7198 (Fax)

Attorneys for Applicant